

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|---------------------------|---|--------------------|
| -----X | : | |
| UNITED STATES OF AMERICA, | : | |
| | : | |
| -against- | : | 20 Crim. 623 (LGS) |
| | : | |
| WILLIE DENNIS, | : | <u>ORDER</u> |
| Defendant. | : | |
| -----X | : | |

LORNA G. SCHOFIELD, District Judge:

WHEREAS, on July 22, July 26 and July 28, 2022, pro se Defendant Willie Dennis filed *ex parte* letters requesting leave to serve subpoenas for individuals and organizations seeking documents and testimony;

WHEREAS, on July 27, 2022, Mr. Dennis sent additional requests by *ex parte* email, which are construed as a letter motion. It is hereby

ORDERED that Mr. Dennis is entitled to have subpoenas for witnesses and documents necessary to his defense served without prior approval by the Court, and he shall comply with Federal Rule of Criminal Procedure 17(a) in filling out the subpoena before serving it. If Mr. Dennis wishes to subpoena documents rather than trial testimony, Mr. Dennis shall use Form AO 89B, Subpoena to Produce Documents, Information, or Objections in a Criminal Case, which is available at the Court's website (<https://www.nysd.uscourts.gov/node/777>). It is further

ORDERED that Mr. Dennis shall comply with Federal Rule of Criminal Procedure 17(d) in having the subpoenas served, meaning it shall be served by a marshal, deputy marshal or any *nonparty* who is at least 18 years old. That is, Mr. Dennis shall not personally serve the subpoenas. It is further

ORDERED that Mr. Dennis shall continue to comply with all conditions of his bail, including those limiting his contact with certain individuals. Mr. Dennis is deemed not to violate

the conditions of his bail by having subpoenas served on any individuals by a third party, but Mr. Dennis shall not communicate directly in writing or by any other means with any persons prohibited by the conditions of his bail, about the subpoenas or any other topic. It is further

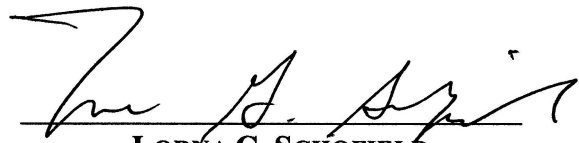
ORDERED that Mr. Dennis shall use the subpoenas only to request specific existing documents or to compel testimony to be used at trial, and he may not use subpoenas to solicit written statements or other materials that the witnesses would have to create, such as lists of names, or to conduct a general fishing expedition. It is further

ORDERED that, if Mr. Dennis is unable to pay any applicable fees for any witness, Mr. Dennis may make an *ex parte* application to have the costs of serving the subpoenas and any other witness fees paid by sending a letter to the Court explaining why he is unable to pay and why the witnesses and/or documents are necessary to his defense under Federal Rule of Criminal Procedure 17(b). For example, Mr. Dennis may state, if true, that a subpoena is needed because he is prohibited from contacting a particular witness directly, and he should explain why the witness's testimony or documents will aid in his defense. It is further

ORDERED that Mr. Dennis's request to direct witnesses to produce documents before trial, on August 22, 2022, and to have documents delivered to his parents' home in Sanford, Florida, in light of the restrictions imposed by the conditions of his bail, is GRANTED. Mr. Dennis shall copy and forward to the Government and to the Court within 72 hours of receipt all documents received from subpoenaed persons and entities. *See generally* Fed. R. Crim. P. 17(c)(1). It is further

ORDERED that Mr. Dennis's application for an extension of time until **August 1, 2022**, to fully comply with the Court's July 15, 2022, Order is GRANTED nunc pro tunc.

Dated: August 1, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Willie E. Dennis, Esq.

[646-509-6889](tel:646-509-6889)

woc2020@gmail.com

July 22, 2022

The Honorable Lorna G. Schofield
United States District Judge
United States District Court Southern District of New York
40 Foley Square
New York, NY 10007

Re: U.S. v. Dennis, 20 Cr. 623 (LGS), Subpoenas and Request For Extension

Dear Judge Schofield,

Please find attached my request for subpoenas with respect to 12 partners of KL Gates, 2 officers of Microsoft 3 other individuals directly connected to U. S. v. Willie Dennis.

I am hereby also respectfully requesting an extension of six (6) business days (until August 1, 2022) for full compliance with your order dated July 15, 2022.

As I am representing myself with no criminal law experience and limited resources, each activity has taken longer than I anticipated. For example, prior to preparing the subpoenas, I had to identify the specific documents being requested and locate the addresses, phone numbers and e-mail addresses for each recipient. Complying with other parts of your order, will require among other things legal research and review.

In making this request, I humbly request the Court to consider. among other things the following:

(i) during the 7 months the Federal Defenders of New York represented me, I frequently made requests of the Federal Defenders to file subpoenas and do much of the research required of me and

(ii) it has been less than 30 days since I began representing myself (including one holiday weekend with lack of access to certain resources) so the learning curve has been steep.

Finally, there continues to be significant and systematic interference with my electronic communications (sending and receiving e-mails) including this past week in my communications with Mr. Cecutti. I have consistently documented this with Pre-trial, the Federal Defenders and others. Mr. Cecutti has advised that I notify the Court and document this interference.

Once I have complied with the Court's order of July 15, 2022, I will assemble and present such documentation to the Court.

Thank you for taking the time to consider my requests
Respectfully submitted,

Willie E. Dennis, Esq

woc2020@gmail.com

[646-509-6889](tel:646-509-6889)

Admitted in New York, New Jersey, and the District of Columbia since 1988

cc: AUSA Sarah Kushner (via e-mail)
AUSA Marguerite Colson (via e-mail)
Anthony Cecutti, Esq. (via e-mail)

Willie E. Dennis, Esq.
[646-509-6889](tel:646-509-6889)
woc2020@gmail.com

July 26, 2022

The Honorable Lorna G. Schofield
United States District Judge
United States District Court Southern District of New York
[40 Foley Square](#)
[New York, NY 10007](#)

Re: U.S. v. Dennis, 20 Cr. 623 (LGS), Request for Subpoenas

Dear Judge Schofield,

Please find attached my request for subpoenas with respect to four (4) Board Members of Microsoft (John W. Thompson, Satya Nadella, Hugh Johnston and Charles Scharf), Donald Gibson of Covington & Burling and David Perez of Perkins Coie.

Thank you for taking the time to consider my requests

Respectfully submitted,

Willie E. Dennis, Esq
woc2020@gmail.com
[646-509-6889](tel:646-509-6889)

Admitted in [New York, New Jersey](#) and the District of Columbia since 1988

From: [Willie Dennis](#)
To: [Schofield NYSD Chambers](#)
Cc: [Willie Dennis](#)
Subject: Subpoenas For Documents-Rule 17(c)
Date: Wednesday, July 27, 2022 9:49:28 AM

CAUTION - EXTERNAL:

Dear Judge Schofield,

I am preparing draft subpoenas for documents today. I have the following questions relating to Rule 17(c):

- 1 . Should I obtain your approval prior to the issuance of the subpoenas ?
2. As I am restricted by bail conditions with respect to travel and have limited funds because of the Governmen's bail conditions prior to modification (the ankle bracelet and home detention prevented me from seeking employment) may I have the documents delivered to the site from where I am currently defending myself, my parents home in Sanford, Florida ?
3. Given the trial is fast approaching I have placed in the draft of the subpoena that all documents should be delivered by August 22, 2022 at 9:30 am. I am not seeking many documents in the subpoenas nor am I seeking any documents that are not prepared in the ordinary course of business. With that being said, of course, I welcome and will follow any guidance by the Court with respect to this issue.
4. I expect Ms. Kushner and Ms. Colson will want copies of any documents I receive. May I have 72 hours to copy and overnight to them ?

Thank you for taking the time to review and consider my questions

Respectfully submitted,

Willie E. Dennis, Esq
woc2020@gmail.com
646-509-6889

Admitted in New York, New Jersey and the District of New York 1988

CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

Willie E. Dennis, Esq.
[646-509-6889](tel:646-509-6889)
woc2020@gmail.com
July 27, 2022

The Honorable Lorna G. Schofield
United States District Judge
United States District Court Southern District of New York
[40 Foley Square](#)
[New York, NY 10007](#)

Re: U.S. v. Dennis, 20 Cr. 623 (LGS), Request for Subpoenas For Documents

Dear Judge Schofield,

I am respectfully requesting subpoenas for documents be issued to Toyota of North America, BlackRock and Norton Rose Fulbright. As discussed in detail below on June 24, 2022 Norton Rose Fulbright agreed to preserve certain documents in connection with Willie Dennis v. KL Gates and U.S. v. Dennis.

The facts are as follows:

On December 12, 2021 (less than 30 days after my arrest and as part of my bail conditions) the Department of Justice delivered the names of several people who I was to have no contact with through at least the conclusion of U. S. v. Dennis. Contact with any of these individuals, will constitute a bail violation and subject me to immediate arrest and incarceration.

Most of the persons named on the list were partners and former partners of KL Gates.

Two of the individuals on the list, Christopher P. Reynolds, an Executive Vice President of Toyota of North America and Kevin G. Chavers, a Managing Director at BlackRock, are not current or former partners of KL Gates. Moreover Toyota of North America and BlackRock are not current or former clients of KL Gates. In addition neither Mr Reynolds or Mr. Chavers have been named as a potential witness by KL Gates or myself in Willie Dennis v. KL Gates. My e-mail and phone records show that I have had no communications with Mr Reynolds since December of 2020 and with Mr Chavers since July of 2021. These communications were transmitted through our business e-mail addresses.

To the best of of my knowledge the only connections I have with Mr Reynolds and Mr Chavers is that we all members of the same chapter in New York City of the fraternity, Sigma Pi Phi, often referred to as the "Boule ". There are less than 35 active members in the chapter. Moreover Mr Chavers is the first and only individual I ever sponsored for induction into the Boule.

Ralph Dawson, an attorney at Norton Rose Fulbright, for whom I am seeking a witness subpoena in connection with his communications with among others the Federal Defenders of New York and the Department of Justice, is also a member of the same Boule chapter. Following the instructions of the Global Chairman of Norton Rose Fulbright, Gerard Pecht and the United States Chairwoman of Norton Rose Fulbright Shauna Clark, the Assistant General Counsel of Norton Rose, Robert Schwinger, has preserved all the documents I am seeking from Norton Rose Fulbright. Please see below the communication dated June 24, 2022 from Mr. Schwinger.

For further information about this issue and other discovery I am seeking with respect to Mr. Reynolds, Mr Chavers and Mr Dawson I have attached my Motion to Demand Discovery dated July 13, 2022.

With respect to Messrs Chavers and Reynolds, the Department of Justice insists it has no such documents (see order of July 15, 2022, in which the Court notes the DOJ claim it has no documents) but there must be something on which Mr Chavers and Mr. Reynolds based their request to be listed on the No Contact List, and subjecting me to arrest and incarceration.

Given that I am apprioximately 60 days from trial, I humbly and respectfully request the Court to grant my request as soon as possible.

Thank you for reviewing and considering my request,

Respectfully submitted,

Willie E. Dennis, Esq
woc2020@gmail.com
[646-509-6889](tel:646-509-6889)

Admitted in [New York, New Jersey](#) and the District of New York

From: "Schwinger, Robert A." <robert.schwinger@nortonrosefulbright.com>

Date: 24 June 2022 at 2:37:00 PM GMT-4

To: woc2020@gmail.com

Subject: RE: Request for Preservation of Records-U.S. v. Dennis, 20 Cr. 623 (LGS)/Dennis v. K&L Gates LLP, et al., No. 1:20-cv-09393-MK.

Dear Mr. Dennis,

Your e-mails to Gerard Pecht and Shauna Clark have been forwarded to my attention. We will preserve the documents you identified as requested.

Best regards,

R. A. S.

Robert A. Schwinger | Partner
Assistant General Counsel
Norton Rose Fulbright US LLP
[1301 Avenue of the Americas, New York, NY 10019, USA](#)
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robert.schwinger@nortonrosefulbright.com
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